

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

United States Courts
Southern District of Texas
FILED

MAR 10 2006

Michael N. Milby, Clerk of Court

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. C-06-181
	§	& C-06-129M
EFRAIN MARTINEZ	§	


MOTION FOR RELEASE OF MATERIAL WITNESSES

COMES NOW, the United States of America, by and through Chuck Rosenberg, the United States Attorney for the Southern District of Texas, and Joel R. Gonzalez, Assistant United States Attorney, and moves this Honorable Court for the release of **Max Alberto Cruz and Douglas Fernando Ramos-Banegas**, material witnesses in the above captioned case, as a joint stipulation has been filed by the Government and the Defendant.

Further, the United States requests that the United States Marshals Service release these witnesses forthwith, into the custody of the Bureau of Immigration and Customs Enforcement.


Respectfully submitted,

CHUCK ROSENBERG
UNITED STATES ATTORNEY

By: 
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CERTIFICATE OF CONSULTATION AND SERVICE

I hereby certify that I have consulted with Scott Ellison, Attorney for defendant EFRAIN MARTINEZ, and with Dennis Sliter, Attorney for material witnesses, regarding the Government's Motion for Release of Material Witnesses in this case and that they are unopposed to same, and that a copy of this motion has been hand delivered to all counsel referenced herein on this 10th day of March, 2006.


JOEL R. GONZALEZ
Assistant United States Attorney